

**LAW OFFICES OF  
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December 20, 2022

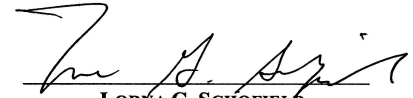
Honorable Lorna G. Schofield  
United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Application **GRANTED**. The initial pretrial conference scheduled for January 25, 2023, is adjourned to **February 8, 2023, at 4:00 P.M.** At that time, the parties shall call 888-363-4749 and use the access code 558-3333. The deadline for the parties to file the joint letter and proposed civil case management plan and scheduling order is extended to **February 1, 2023, at 12:00 P.M.**

Dated: December 21, 2022

New York, New York

Re: Obreight Ingram v. International Asbestos Removal, Inc., et al  
1:22-cv-10149 (LGS)  
Request for Adjournment

  
LORNA G. SCHOFIELD  
UNITED STATES DISTRICT JUDGE

Dear Judge Schofield:

I am counsel for the plaintiff in the above referenced matter. As you may recall, I sent a letter motion seeking an adjournment of the scheduled pre-trial initial conference in this matter currently scheduled for January 25, 2023, on account of the fact that I will still be on an airplane returning from Colorado at the appointed time. Earlier on January 25, 2023 does not present an alternative either, as I will be traveling to the airport and phone service is spotty at best.

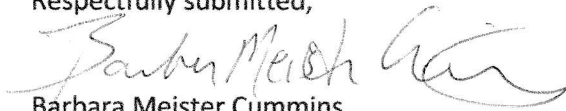
Since you denied that request without prejudice on December 19, 2022, you indicated we could renew our request for adjournment, this time explaining both my schedule and that of Defendants' counsel, Saul Zabell, to better understand when we might both be available for that conference after January 25, 2023. After connecting with Mr. Zabell this morning, I have put together that schedule and attach it with this renewed motion. In review of the attached, it appears that we are both available prior to 10:30 AM on February 3; any time on February 6; after 2:00 PM on February 8, and again, the entire week of February 27, 2023, if any of those times and dates suit the court.

Please let us know if any of those dates would be suitable for the court, and if your Honor would also be adjourning the due date for the provision of a Proposed Civil Case Management Plan and joint letter to the court to the week before the newly adjourned IPTC, whenever that might be.

As stated above, we have made a prior request for adjournment on December 15, 2022, to which we received your denial without prejudice on December 19, 2022, seeking more detail as to counsels' availability between January 25, 2023 and February 27, 2023. Opposing counsel is in agreement with this request.

Thank you for your consideration. If you need anything further, please let me know.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Barbara Meister Cummins", written in a cursive style.

Barbara Meister Cummins  
Counsel for Plaintiff, Obreight Ingram

Cc: Saul Zabell, Esq.

attachment